

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:21-CR-107

JAMARR SMITH

**RESPONSE TO DEFENDANT'S SUPPLEMENTAL MOTION FOR REDUCTION IN  
TERM OF IMPRISONMENT and/or COMPASSIONATE RELEASE**

Comes now, the United States of America, by and through its attorney, Clay Joyner, United States Attorney for the Northern District of Mississippi, and responds to the Defendant's Supplemental Motion for Reduction in Term of Imprisonment and/or Compassionate Release [Doc. 219], and would show unto the Court as follows:

The defendant has previously filed a motion seeking compassionate release to which the government has responded. That motion is still pending. The government would adopt and incorporate its response to the original motion.

The defendant has now supplemented his original motion to include information concerning Ianetta Lee's pending carpal tunnel surgery. Ms. Lee is the mother of the defendant's two children. Ms. Lee shares custody of the children with the defendant's mother, Jackie Smith. The defendant contends that Ms. Lee will be unable to care for the children while she is recovering from her carpal tunnel surgery.

Without rehashing all of the points of the government's previous response, the defendant's motion should be denied. The defendant needs to be held accountable for the crime that he has committed. The government would respectfully suggest that the defendant's mother, Ms. Smith, may have to take on full-time care of the defendant's children while Ms. Lee is recovering from her surgery or perhaps arrangements need to be made with other family members for the care of the children. The defendant actively participated in a violent crime and to release him because he

has young children that need to be cared for would be a travesty to the victim of his crime.

**Conclusion**

For these reasons, as well as the reasons set forth in the government's response to the defendant's original motion for compassionate release, the government respectfully requests that the defendant's motion be denied.

This the 12<sup>th</sup> day of April, 2024.

Respectfully submitted,

CLAY JOYNER,  
United States Attorney  
MS Bar No. 10316

By: /s/ Robert J. Mims.  
ROBERT J. MIMS, MS Bar No. 9913  
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**CERTIFICATE OF SERVICE**

I, Robert J. Mims, AUSA, do hereby certify that I have this day electronically filed the foregoing **Response to Defendant's Supplemental Motion for Reduction in Term of Imprisonment and/or Compassionate Release** with the Clerk of the Court using the CM/ECF system and that the following parties will be notified electronically of filing:

[glewis@hickmanlaw.com](mailto:glewis@hickmanlaw.com)  
Honorable Goodloe Lewis

This the 12<sup>th</sup> day of April, 2024.

/s/ Robert J. Mims  
ROBERT J. MIMS